

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v.-

SEAN COMBS,

Defendant.

DECLARATION OF JANE KIM

24 Cr. 542 (AS)

STATE OF NEW YORK)
COUNTY OF NEW YORK) ss.
SOUTHERN DISTRICT OF NEW YORK)

JANE KIM hereby declares under penalty of perjury:

1. I am a Deputy Chief of the Criminal Division, in the Office of Damian Williams, United States Attorney for the Southern District of New York. I am not a member of the prosecution team responsible for the investigation that led to the above-referenced case (the “Investigation”). I submit this Declaration in response to the Court’s Order of December 2, 2024 (Dkt. 93), and in support of the Government’s opposition to the Defendant’s motion of October 9, 2024 (Dkt. 31).

2. I understand that Assistant United States Attorneys (“AUSAs”) Meredith Foster, Emily Johnson, Christy Slavik, Madison Smyser, Mitzi Steiner, and Maurene Comey are responsible for the investigation and prosecution of Defendant Sean Combs (*i.e.*, the Investigation). I have learned that two Special Agents and one Task Force Officer with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), and one Special Agent and two Task Force Officers with the United States Attorney’s Office for the Southern District of New York (“SDNY”), are responsible for the Investigation.

3. On December 2 and December 3, 2024, I separately spoke to each of the six AUSAs assigned to the Investigation, each of the two HSI Special Agents assigned to the Investigation, the HSI Task Force Officer assigned to the Investigation, the SDNY Special Agent assigned to the Investigation, and each of the two SDNY Task Force Officers assigned to the Investigation, about the allegations of disclosures contained in the Defendant's submissions to the Court. They each affirmed that they have not disclosed information they learned during the course of the Investigation to any member of the press.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
December 3, 2024

By: /s Jane Kim
Jane Kim
Deputy Chief, Criminal Division
United States Attorney's Office
Southern District of New York